

KLEIN, DADAY, ARETOS & O'DONOGHUE, LLC

PLEASE NOTE OUR NEW ADDRESS:

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<https://secure.lawpay.com/pages/kdaolaw/operating>

2726 W. Cortez Condo Association
 2726 W. Cortez Street
 Unit 2
 Chicago, IL 60622

Invoice

Invoice Number	4277
Invoice Date	08/19/2020
Payment Due On	09/18/2020
Amount Due	\$2,000.30

[Pay Now](#)

2726 W. Cortez Condo Association v. Erie Ins. Group (Litigation)

20190630-Trust on Account - 2726 W. Cortez Condo Association - General Litigation

Fees

Date	Subject	Staff	Rate	Hours	Total
06/26/2020	Email sent/reviewed regarding 2726 West Cortez v. Erie Ins Co (19-CH-10902)	SGD	\$400.00	0.10	\$40.00
06/30/2020	Email sent/reviewed regarding 2726 West Cortez Condominium Assoc. v. Erie Insurance Group A00000529765 EIG.19309: 2726 West Cortez v. Erie Ins Co (19-CH-10902)	RKK	\$300.00	0.20	\$60.00
07/01/2020	Emails sent/reviewed regarding 2726 W. Cortez Condo Association v. Erie Insurance Group Cook County Case No. 19 CH 10902	RKK		0.20	\$0.00
07/02/2020	Emails sent/reviewed regarding 2726 West Cortez v. Erie Ins Co (19-CH-10902) - Instructions for Remote Proceeding	RKK	\$300.00	0.30	\$90.00

07/06/2020	Email sent/reviewed regarding 2726 West Cortez v. Erie Ins Co (19-CH-10902) - Instructions for Remote Proceeding	SGD	\$400.00	0.20	\$80.00
07/06/2020	Emails sent/reviewed regarding 2726 West Cortez v. Erie Ins Co (19-CH-10902) - Instructions for Remote Proceeding	ES	\$90.00	0.20	\$18.00
07/07/2020	Email sent/reviewed regarding 2726 West Cortez v. Erie Ins Co (19-CH-10902) - Instructions for Remote Proceeding	RKK		0.20	\$0.00
07/07/2020	Reviewed file; prepared notes for court hearing	RKK	\$300.00	0.60	\$180.00
07/08/2020	Complaint for 2726WC - filed 9-20-19 reviewed	SGD	\$400.00	0.30	\$120.00
07/08/2020	Counterclaim (excerpt from Answer) reviewed	SGD	\$400.00	0.10	\$40.00
07/08/2020	Email sent/reviewed regarding 2726 W. Cortez Condo Association v. Erie Insurance Group Cook County Case No. 19 CH 10902	SGD	\$400.00	0.20	\$80.00
07/08/2020	Erie Amended Answer and Affirmative Defenses to Cortez Complaint reviewed	SGD	\$400.00	0.20	\$80.00
07/08/2020	Metropolitan Builders reviewed	SGD	\$400.00	0.10	\$40.00
07/08/2020	P's Answer to Amended Affirmative Defenses & Counterclaim - filed 5-12-20 reviewed	SGD	\$400.00	0.10	\$40.00
07/09/2020	Emails sent/reviewed regarding 2726 West Cortez Condominium Assoc. v. Erie Insurance Group A00000529765 EIG.19309: Proposed Order	SGD	\$400.00	0.10	\$40.00
07/09/2020	Status 2726 W. Cortez attended	SGD	\$400.00	0.50	\$200.00
07/09/2020	TC w/ client	SGD	\$400.00	0.30	\$120.00
07/13/2020	Emails sent/reviewed regarding 2726 W. Cortez Condo Association v. Erie Insurance Group Cook County Case No. 19 CH 10902	SGD	\$400.00	0.10	\$40.00
07/24/2020	Motion for Judgment on the Pleadings created	RKK	\$300.00	0.10	\$30.00
08/17/2020	Email sent/reviewed regarding Cortez	SGD	\$400.00	0.10	\$40.00
					\$1,338.00

Subtotal	\$1,338.00
Total	\$1,338.00
Prior Balances	\$662.30
Total Balance Due	\$2,000.30

Klein, Daday, Aretos & O'Donoghue, LLC

2550 West Golf Road, Suite 250

Rolling Meadows, IL 60008

Telephone: 847-590-8700

November 14, 2019

Invoice No. 34560

2726 W. Cortez Condo Association
 John Gorr
 2726 W. Cortez Street
 Unit 2
 Chicago, IL 60622

Client Number: 19483 2726 W. Cortez Condo Association

Matter Number: 20190630 2726 W. Cortez Condo Association v. Erie Ins. Group

For Services Rendered Through 11/14/2019.

Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
6/17/2019	SGD	Email regarding 2726 W Cortez - Water damage	0.20	\$80.00
7/30/2019	RKK	Reviewed file	0.20	\$60.00
8/18/2019	RKK	Research re: Erie Insurance domicile and status	0.20	\$60.00
8/18/2019	RKK	Drafted complaint	0.80	\$240.00
8/19/2019	RKK	Continued drafting complaint	0.50	\$150.00
8/19/2019	RKK	Email to SGD re: draft complaint	0.20	\$0.00 N/C
9/3/2019	SGD	Review of complaint	0.25	\$100.00
9/18/2019	RKK	Email with SGD re: complaint	0.10	\$0.00 N/C
9/18/2019	RKK	Email to SGD re: finalizing complaint	0.30	\$0.00 N/C
9/18/2019	RKK	Prepared exhibits for complaint	0.20	\$60.00
9/20/2019	RKK	Email to client re: complaint filed	0.10	\$30.00
9/20/2019	RKK	Finalized complaint and prepared for filing	0.10	\$30.00
9/20/2019	RKK	Prepared Summons and service list	0.30	\$90.00
9/20/2019	RKK	Filed complaint and summons with clerk via court's online filing system; noted file	0.20	\$0.00 N/C
9/23/2019	RKK	Email to CI re: filing fee	0.10	\$0.00 N/C
9/23/2019	RKK	Reviewed court's online filing system re: filed case; downloaded and saved copies of file-stamped Summons and Complaint; noted file re: fee	0.10	\$0.00 N/C
9/23/2019	RKK	Email with client re: status	0.10	\$30.00

Continued On Next Page

Client Number: 19483
 Matter Number: 20190630

11/14/2019

Page: 2

9/23/2019	RKK	Email to SGD re: serving defendant	0.10	\$0.00 N/C
9/23/2019	RKK	Email to SGD re: sending docs to Sonne	0.10	\$30.00
9/23/2019	RKK	Email to YB re: sending docs to process server	0.10	\$0.00 N/C
10/9/2019	RKK	Reviewed process server's online records status of service; noted file re: still pending	0.10	\$30.00
10/14/2019	SGD	REview correspondence; email to client; Email regarding RE: 2726 W Cortez - Signed Retainer at 10:43a.	0.20	\$80.00
10/14/2019	SGD	Email to oc; Email regarding RE: 2726 West Cortez Condominium Assoc. v. Erie In at 10:41a.	0.20	\$80.00
10/14/2019	RKK	Reviewed process server's online records status of service; noted file re: still pending	0.10	\$30.00
10/14/2019	RKK	Email to process server re: status of service	0.10	\$30.00
10/14/2019	RKK	Reviewed email from process server re: service; reviewed and saved copy of Affidavit of Service; noted file re: served	0.10	\$30.00
10/14/2019	RKK	Email to SGD re: service	0.10	\$0.00 N/C
10/14/2019	RKK	Email with SGD re: docketing date	0.10	\$0.00 N/C
10/26/2019	RKK	Reviewed email from Clerk re: appearance; downloaded and saved copy of appearance filed by defendant's attorney; calendared court date; noted file re: OC's contact info	0.20	\$60.00
10/31/2019	RKK	Email to OC re: copy of complaint with exhibits	0.10	\$30.00
11/8/2019	SGD	review motion for extension.	0.25	\$100.00
11/10/2019	RKK	Reviewed notices from court's online filing system re: motion and notice of motion filed; downloaded and saved copies; reviewed NOM and routine motion for extension of time to file responsive pleadings; noted file	0.20	\$60.00
11/10/2019	RKK	Email with client re: status	0.30	\$90.00
Billable Hours / Fees:			4.90	\$1,580.00

Timekeeper Summary

Timekeeper RKK worked 3.80 hours at \$300.00 per hour, totaling \$1,140.00.

Timekeeper RKK worked 1.40 hours at no charge.

Timekeeper SGD worked 1.10 hours at \$400.00 per hour, totaling \$440.00.

Continued On Next Page

Client Number: 19483
 Matter Number: 20190630

11/14/2019

Page: 3

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
9/20/2019	Clerk of Court: Filing fee	\$399.21
	Total Costs	\$399.21

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
7/20/2019	Credit Card Payment	(\$5,500.00)
	Total Payments Received:	(\$5,500.00)

Current Invoice Summary

Prior Balance:	\$0.00	
Payments Received:	(\$5,500.00)	Last Payment: 7/20/2019
Unpaid Prior Balance:	(\$5,500.00)	
Current Fees:	\$1,580.00	
Advanced Costs:	\$399.21	
CREDIT BALANCE, DO NOT PAY:	(\$3,520.79)	

For Credit Card Payments log into either of our sites below:
 LawPay: <https://secure.lawpay.com/pages/kdaolaw/operating>
 Firm Website: www.kdaolaw.com

WE APPRECIATE YOUR BUSINESS.

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Stephen G. Daday
Michael G. Aretos
Timothy J. O'Donoghue

Kristopher M. Briggs*
Robyn K. Kish
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**-Licensed in Illinois
& Wisconsin*

March 17, 2021

Mike Galasinski
Arrow Masonry & Exteriors, Inc.
515 S. Vermont St., Suite A
Palatine, IL 60067

Re: **Contract with 2726 W. Cortez Condo Association; Our File No. 2020-0523**

Dear Mr. Galasinski:

Please be advised that we are the attorneys for the 2726 W. Cortez Condominium Association. We've been retained by the Association in regards to the contract with your company, Arrow Masonry & Exteriors, Inc., dated May 7, 2018. A copy of the contract is enclosed herewith. Pursuant to the contract, Arrow was supposed to do spot grinding, spot tuckpointing, caulking, flashing installation, and sealing. Arrow claimed it completed the work under the contract and my client paid Arrow in full under the contract, in the amount of \$16,840.

The Association has since had Arrow's work inspected and corrected by another company. According to the inspection, Arrow's work was not performed pursuant to the terms of the contract. Arrow failed to apply the PITFLEX sealant according to the manufacturer's recommendations, voiding any manufacturer's warranty. The manufacturer's recommendations require two (2) coats to be applied but Arrow only applied one (1) coat. The sealant was applied so poorly that it left multiple pin holes in the coating that continued to let water seep into the building. Further, Arrow did not do any tuckpointing as provided in the contract. Arrow also caulked rope wicks, weeps, and window and door lintels, all of which trapped moisture further damaging the building.

Due to Arrow's failure to perform the work in the contract and the sub-standard work that was done, the Association hereby demands that Arrow reimburse it for the full amount under the contract in the amount of \$16,840 within the next fourteen (14) days. Should you fail to do so, the Association will consider further legal action under the contract. Should you have any questions or if you wish to discuss this matter further, please contact me.

Yours truly,

/s/ Robyn K. Kish

Robyn K. Kish
Enclosure